

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KPM ANALYTICS NORTH AMERICA
CORPORATION,

Plaintiff,

v.

BLUE SUN SCIENTIFIC, LLC; THE INNOVATIVE
TECHNOLOGIES GROUP & CO., LTD; ARNOLD
EILERT; MICHELLE GAJEWSKI; ROBERT
GAJEWSKI; RACHAEL GLENISTER; GREGORY
ISRAELSON; IRVIN LUCAS; and PHILIP
OSSOWSKI,

Defendants.

Civil Action No. 4:21-cv-10572-LTS

Leave to file under seal

allowed August 19, 2022 (ECF No. 143)

**DEFENDANT THE INNOVATIVE TECHNOLOGIES GROUP & CO., LTD'S MOTION
FOR SUMMARY JUDGMENT AND REQUEST FOR HEARING**

Defendant The Innovative Technologies Group & Co., Ltd ("ITG"), by and through its undersigned counsel, hereby files this Motion for Summary Judgment and Request for Hearing pursuant to Federal Rule of Civil Procedure 56(c) and Local Rule 7, and states as follows:

1. ITG incorporates the attached Memorandum of Law and Supporting Exhibits in support of its Motion.

REQUEST FOR ORAL ARGUMENT

Defendant The Innovative Technologies Group & Co., Ltd hereby requests oral argument on this motion.

BLUE SUN SCIENTIFIC, LLC, and THE
INNOVATIVE TECHNOLOGIES GROUP
& CO., LTD,

Dated: August 19, 2022

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of this document was served upon counsel of record by email on August 19, 2022.

/s/ George F. Ritchie
George F. Ritchie